

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

Docket No.:  
3:03-CV-30290-MAP

DIRECTV, INC., )  
Plaintiff )  
 )  
v. )  
 )  
DEAN MOLTA, )  
Defendant )

**ANSWER**

Now comes the Defendant, Dean Molta, in Answer to the Plaintiff's Complaint and states:

1. Defendant is without information sufficient to admit or deny the allegations asserted in paragraphs 1 through 17 of the Plaintiff's Complaint.
2. Defendant denies the allegations asserted in paragraphs 18 through 22 of the Plaintiff's Complaint.
3. Defendant states that paragraphs 23 through 26 of the Plaintiff's Complaint assert conclusions of law and therefore no answer is necessary. However, to the extent that said paragraphs assert allegations of fact, they are denied.
4. Defendant denies the allegations asserted in paragraphs 27 through 48 of the Plaintiff's Complaint.

Wherefore, the Defendant requests this Court to dismiss the actions against him.

Defendant Requests a trial by jury on all matters so triable.

**FIRST AFFIRMATIVE DEFENSE**

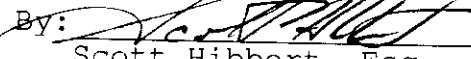
Plaintiff's Complaint fails to state a claim upon which relief can be granted.

**SECOND AFFIRMATIVE DEFENSE**

Service of Complaint upon the Defendant was insufficient under Fed.R.Civ.P. Rule 4(e) and (m).

Respectfully submitted,  
DEAN MOLTA

By:

  
Scott Hibbert, Esq.  
100 Main Street  
Agawam, MA 01001  
(413) 789-9800  
(413) 786-9084 fax  
BBO# 568158